

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

OLD LADDER LITIGATION CO., LLC., as Litigation
Designee on behalf of the Liquidation Trust,

Plaintiff,

- against -

INVESTCORP BANK B.S.C., et al.,

Defendant.

:
:
: 08 CV 0876 (RMB) (THK)

**JOINDER TO DEFENDANTS' JOINT
MOTIONS TO TRANSFER VENUE
AND TO DISMISS THE COMPLAINT**

**JOINDER TO DEFENDANTS' JOINT MOTIONS
TO TRANSFER VENUE AND TO DISMISS THE COMPLAINT**

Defendant John Fiumefreddo, by its undersigned counsel, hereby joins in Defendants' Joint Motions to Transfer Venue and to Dismiss the Complaint and Opening Memorandum of Law (Docket Nos. 83 and 84) for the reasons stated therein and request similar relief or any other relief the Court deems necessary and proper. In support of Defendants' Joint Motions to Transfer Venue and to Dismiss the Complaint, John Fiumefreddo attaches his declaration, as Exhibit A.

Respectfully submitted,

John A. Bannon (admitted *pro hac vice*)
Colleen M. Feeney (admitted *pro hac vice*)
Jeanne Cho (JC4631)

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By: 

Jeanne Cho (JC 4631)

EXHIBIT

A

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DECLARATION OF JOHN FIUMEFREDDO

John Fiumefreddo, pursuant to 28 U.S.C. §1746, states as follows:


1. I submit this declaration in support of the portion of Defendants' Motion to dismiss seeking dismissal of the claims brought against me on the grounds that this Court lacks jurisdiction over my person.

2. From the summer of 2002 until January 11, 2005, I was employed at Werner Co.

3. Werner Co.'s headquarters were located in Greenville, Pennsylvania and my offices during this period were located in Greenville, Pennsylvania.

4. From summer of 2002 until January 11, 2005, I resided in Greenville, Pennsylvania. I currently reside and work in Winchester, Virginia.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 6-13-02.


John Fiumefreddo